

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Lordstown Motors Corp., *et al.*,¹

Debtor.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

Docket Nos. 860 & 871

**CERTIFICATION OF COUNSEL REGARDING SECOND STIPULATION
BETWEEN DEBTORS AND U.S. SECURITIES AND EXCHANGE
COMMISSION TO EXTEND THE DEADLINE TO FILE CLAIMS**

The undersigned counsel to the above-captioned debtors and debtors-in-possession (the “**Debtors**”) hereby certifies as follows:

1. On August 24, 2023, the Court entered its *Order (A) Establishing Bar Dates and Related Procedures for Filing Proofs of Claim, Including Claims Arising Under Section 503(B)(9) of the Bankruptcy Code, (B) Approving the Form, Manner, and Procedures of Notice Thereof, and (C) Granting Related Relief* [D.I. 319] (the “**Bar Date Order**”) setting a deadline, among other things, for governmental units to file a Proof of Claim against the Debtors of December 26, 2023 at 5:00 p.m. (the “**Governmental Bar Date**”).

2. On December 22, 2023, in an effort to continue discussion amongst the parties regarding the claims that the U.S. Securities and Exchange Commission (the “**SEC**”) may hold against the Debtors, the SEC, the Official Committee of Unsecured Creditors (the “**UCC**”), the Official Committee of Equity Security Holders (the “**EC**”) and the Debtors entered into, and filed under certification of counsel, the *Stipulation Between Debtors and U.S. Securities and Exchange*

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

Commission to Extend the Deadline for Filing Proofs of Claim [Docket No. 860] (the “**First Extension Stipulation**”). On December 27, 2023, the Court entered the *Order Approving Stipulation Between the Debtors and U.S. Securities Exchange Commission to Extend the Deadline to File Claims* [Docket No. 870]. The First Extension Stipulation extended the Governmental Bar Date solely for the SEC to December 29, 2023.

3. In an effort to further continue discussions amongst the parties regarding the claims, the SEC, the UCC, the EC and the Debtors entered into the *Second Stipulation Between Debtors and U.S. Securities and Exchange Commission to Extend the Deadline for Filing Proofs of Claim* (the “**Second Extension Stipulation**”) which extends the Governmental Bar Date solely for the SEC to January 5, 2024. Attached hereto as Exhibit A is a proposed order (the “**Proposed Order**”) approving the Second Extension Stipulation. A copy of the Second Extension Stipulation is attached to the Proposed Order as Exhibit 1.

WHEREFORE, the Debtors respectfully request that the Court enter the Proposed Order approving the Second Extension Stipulation at the Court’s earliest convenience.

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Dated: December 28, 2023
Wilmington, Delaware

/s/ Donald J. Detweiler

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